

220250



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2009-469-C

November 6, 2009

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Saluda Building
Columbia, South Carolina 29210

Dear Mr. Terreni:

Hargray, Inc.-SC, Operating Company Number (OCN) 5385, requests a state waiver from the Public Service Commission of South Carolina to grant assignment of their request to the North American Numbering Plan Administrator (NANPA) for additional numbering resources in the Beaufort rate center.

The Beaufort County government of South Carolina has submitted a request to Hargray, Inc. for a full NXX assignment in the Beaufort rate center. The attached request from the Beaufort County government outlines the purpose and scope of the new NXX code for their agency (see attachment A).

With this new NXX, the Beaufort County Government will streamline their numbering resources to the benefit of all residents of Beaufort. A single, common NXX will be easily identifiable as a county service providing tax payers, employees and residents with a more efficient system for contacting any of the numerous county agencies. This change will correct an antiquated numbering plan utilized by the county government in the decades past and will allow the Beaufort County Council to honor a commitment to all constituents of Beaufort to provide ease with which these constituents seek and receive services.

In addition, the establishment of a new NXX for the Beaufort County Government will allow the return of numerous numbering assignments, which were previously obtained by Beaufort County, to the various service providers within the Beaufort area. This will place several thousand numbers back in the inventory of these providers to subsequently assign to future customers, which will assist with number conservation issues.

Echelon Building II, Suite 200
9430 Research Boulevard, Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Building B-3, Suite 200, Atlanta, Georgia 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

To qualify for an additional NXX in the Beaufort rate center, Hargray, Inc. must meet Months to Exhaust (MTE) and utilization requirements as established by the FCC and as stated in ATIS' Central Office Code Assignment Guidelines (COCAG). Per section 4.3.1 of the COCAG, the MTE and utilization requirements state a service provider must be 75% utilized in current numbering resources for the rate center and "demonstrate that existing codes for the rate center will exhaust within 6 months".

Hargray, Inc. submitted a request to NANPA on October 29, 2009 for the assignment of a full NPA-NXX code in the Beaufort rate center and was subsequently denied on November 3, 2009 due to the required MTE and utilization levels (see NANPA's Part 3 Confirmation for denial of resources, attachment B). Hargray, Inc. demonstrated a 17% utilization level of current codes in the Beaufort rate center with no anticipation of exhausting the remaining numbering inventory for Beaufort in the next 6 months (see NANPA's MTE worksheets, attachment C, for utilization and exhaust calculations).

To accommodate the numbering needs of the Beaufort County Government, Hargray, Inc. is requesting the Public Service Commission of South Carolina grant a state waiver for their numbering request in the Beaufort rate center.

Questions regarding this matter may be directed to Mr. Trey Judy, Director of Regulatory and Carrier Relations, at Hargray Communications Group, Inc., 843-686-1210.

Sincerely,



Karen Hoffman
Manager-Network Services
John Staurulakis, Inc.

Enclosures

cc: Mr. Dukes Scott
Executive Director of Regulatory Staff
South Carolina Office of Regulatory Staff

cc: Mr. Trey Judy
Director-Regulatory & Carrier Relations
Hargray Communications Group, Inc.

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ATTACHMENT A

**BEAUFORT COUNTY COUNCIL***Management Information Systems Dept.*

P.O. Drawer 1228

Beaufort, SC 29901

Office (843) 470-3683

Fax (843) 470-3676

Memorandum**DATE:** October 12, 2009**TO:** Hargray Communications**FROM:** BEAUFORT COUNTY Government (County)**SUBJECT:** Justification for new NXX code:**BACKGROUND**

Beaufort County, South Carolina is located on the southern coast of South Carolina situated between Savannah, GA, to the south and Charleston, SC to the north. Beaufort County is very geographically diverse spreading from the Town of Hilton Head Island south of the Broad River to the Town of Yemassee located to the extreme north. Beaufort County has approximately 150,000 full time residents which includes three (3) military bases.

The County operates under a Council-Administrator form of government. The Management of Information System (MIS) Department reports to the County Administrator. The County employs approximately 1390 full-time and part-time employees.

COUNTY ADMINISTRATOR

Beaufort County is asking Hargray to help the County secure a new NXX code for our new VoIP phone system. The County has invested over \$2.7M in this new system with the promise to our residents, taxpayers and employees of making this new system much more effective than our legacy system. A key part of that migration to the new VoIP system includes making County Government as assessable and transparent as possible. The fulfillment of that promise starts with a new, single, easily identifiable prefix code. The current numbering plan is confusing and complicated. We ask for your help in simplifying our numbering plan.

PUBLIC SAFETY

This change will allow Beaufort County Government the accessibility to utilize four-digit dialing within and throughout all county facilities. This will ease the day to day operations of the county's functionality with the community as well as its employees. Additionally, from a Command Staff position, locating key personnel during the normal course of conducting daily business or during an emergency situation, a twelve (12) page "Recall Roster" must be on hand to keep track of the various telephone numbers, versus the ability to dial a four digit number to contact all officers and non-sworn employees.

The ability to track and trace all call coming into emergency responses needed for public safety reduces confusion for public when in need for emergency response. The new VoIP will allow a recording device to be utilized as a backup informational device and services as documentation in cases of replaying service information received.

Having a dedicated prefix for all Beaufort County Government agencies will considerably consolidate the ease at which Sheriff's Office communicates through public safety organizations, especially during emergency situations.

EMERGENCY MANAGEMENT DIVISION (EMD) / EMERGENCY 911 (E-911)

Beaufort County has several prefixes used on its telephone lines throughout the County. In the Emergency Operation Center (EOC) the Computer Aided Dispatch (CAD) displays the telephone number when a call is received. In an effort to streamline this process the ability to have one prefix would be beneficial as it relates to Command and Control. Beaufort County and the municipalities within the county have adopted the National Incident Command System. As part of the effort to fully implement this program within the County the County Emergency Operations Center utilizes the command and control group. This group consists of a representative from each municipality within the county, a representative of the county government and the military bases within the county.

Through this group concept we organize the coordination of the emergency operations which are conducted in response to a man made or natural disaster. This command group serves as the incident management team. Depending on the incident and its location there are multiple satellite Command and Control points throughout the County, specifically most Fire Department may be used. Having only one prefix assigned for all county agencies and those identified as Command and Control locations would be beneficial to both the County and the Emergency Operations Center.

MANAGEMENT OF INFORMATION SYSTEMS (MIS)

The Beaufort County Government has invested over \$2.7 M USD in a new VoIP telephone system. The MIS Department plans to deploy this new system to over 1900 end users from the South to the North. In addition to supporting the Administrator's personnel and departments, the MIS Department is responsible for deploying this new telephone system to other public agencies that are housed in County facilities such as:

- Animal Control / Shelter
- (2) Airports
- Coroner's Office
- Department of Special Needs
- Department of Social Services
- (2) 911-Dispatch Centers
- (3) Emergency Management Services
- (11) Emergency Medical Services
- (16) Fire Departments
- (7) Hurricane Recovery Centers
- Judicial Public Defender
- Judicial Solicitor
- (4) Magistrates Office
- (3) Military Base
- Public Works
-
- (11) Sheriff Offices

The new NXX codes that we are applying will allow Beaufort County to clean up of over 20 years of past billings which will reduce monthly re-occurring cost. Beaufort County Government has over 6,000 telephone lines are dispersed throughout 923 miles radius which will be released back into local service providers with various NXX codes for public usage; which will help to assist surrounding smaller agencies, business, and other municipalities to fulfill their need or desire to grow within their reserved numbering plans.

Beaufort County will be releasing upon approval of SEC a total of (21) various numbering groups back in the local community to include the following:

208	521	689	815	987
322	522	706	838	
349	524	757	842	
466	525	770	846	
470	681	785	986	

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Mr. Gary Kubic
Beaufort County Administrator

Sheriff P.J. Tanner
Beaufort County Sheriff

William Winn Jr.
Beaufort County Deputy Administrator of Public Safety

Ted S. Anderson
Beaufort County MIS Director

ATTACHMENT B

Angie Mackey

From: michael.ortega@neustar.biz
Sent: Tuesday, November 03, 2009 2:21 PM
To: Angie Mackey
Cc: part3@neustar.biz
Subject: Part 3 for tracking id:843-371221

**NANP Administration System**

Dated 03 November 2009

Central Office Code Assignment Guidelines (COCAG)
Central Office Code (NXX) Assignment Request - Part 3 - ATIS-0300050.p3
Revised: February 9, 2004

Administrator's Response/Confirmation Tracking Number: 843-371221

Date of Application:	<u>10/29/2009</u>	Date of RECEIPT:	<u>10/29/2009</u>
Date of Response:	<u>11/03/2009</u>	Effective Date:	<u></u>
Company/Entity Name:	<u>HARGRAY, INC.-SC</u>	Service Provider OCN:	<u>5385</u>
Contact Name:	<u>Angie Mackey</u>	Phone:	<u>301-459-7590</u>
		Email:	<u>amackey@jsitel.com</u>
		Fax:	<u>240-556-1399</u>

Code Administrator Contact Information:

<u>Michael Ortega</u>	Phone:	<u>571-434-5348</u>
<u>Signature of Code Administrator</u>		
<u>Michael Ortega</u>	Fax:	<u>571-434-5502</u>
Name (print)		
	Email:	<u>michael.ortega@neustar.biz</u>

 NPA: 843 **Code Assigned:** **Date of NXX Code Assignment:**
 Switch Identification(Switch Entity/POI): **Rate Center:** BEAUFORT

 Code Reserved: **Date of Reservation:**
 Your code Reservation will be honored until:
 Switch Identification (Switch Entity/POI):

Form incompleteAdditional information required in the following sections(s)

X **Form Complete, code request denied.**

Explanation: _____

 Assignment activity suspended by the administrator.

Explanation: _____

Further Action: _____

 NPA in jeopardy: Yes: _ No: ____

If yes, refer to the Section 9 of the assignment guidelines

Remarks:

According to the FCC 2nd Report and Order (FCC 00-429) effective June 30, 2003, in order to receive additional numbering resources, the MTE form you submit must meet the 75% utilization level. If you are in disagreement with the disposition of this code request, please refer to the Central Office Code (NXX) Assignment Guidelines for the appeals process.

A copy of this Part 3 has been sent to the following users/email addresses.

ATTACHMENT C

Effective June 11, 2001

Appendix B

CO CODE ASSIGNMENT
MONTHS TO EXHAUST CERTIFICATION WORKSHEET - TN Level¹
(Worksheet to be used for Request for Additional Codes for Growth)

Date: 10/29/2009 Company Name: HARGRAY, INC.-SC

Rate Center: BEAUFORT

NPA-NXXs included in growth calculation²: 843-379, 843-644, 843-645

Signature of Authorized Representative of Code Applicant: Angie Mackey

Title: Analyst Telephone No.: 301-459-7590 FAX No.: 240-556-1399

A. Telephone Numbers (TNs) Available for Assignment (See Glossary³): 24917

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
B. Previous 6-month growth history ⁴	<u>25</u>	<u>30</u>	<u>40</u>	<u>50</u>	<u>25</u>	<u>50</u>						
C. Forecast - Next months 1-12 ⁵	<u>10000</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>	<u>50</u>
D. Average Monthly Forecast (Sum of months 1-6 Part C above divided by 6):	<u>1708.33</u>											
E. Months to Exhaust ⁶ =	$\frac{\text{Telephone Numbers(TNs) Available for Assignment(A)}}{\text{Average Monthly Forecast(D)}}$						=	<u>14.59</u>				
F. Utilization Level ⁷ =	$\frac{\text{Telephone Numbers (TNs) Assigned}}{\text{Total Numbering Resources in Applicant's Inventory}}$						X 100	<u>17.0</u>				

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Code Administrator; for audit purposes, it must be in the applicant's files.

²Report on all resources for the requested geographic area, including newly acquired codes.

³Definitions of terms may be found in the Glossary section of the Central Office Code (NXX) Assignment Guidelines.

⁴Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁵Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁶To be assigned an additional CO Code (NXX) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁷Newly acquired numbers (see glossary) may be excluded from the utilization calculation (FCC 00-104, section 52.15 (g) (3) (ii)).